

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re Zydus Unsolicited Fax Litigation

)
) Case No. 13-cv-3105
)
) Hon. Sara L. Ellis
)

UNOPPOSED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff moves for entry of a Protective Order to govern the disclosure and use of confidential information in this litigation. Defendants do not oppose the relief sought herein. A copy of the Agreed Confidentiality Order will be submitted to the Court by email.

The parties have met and conferred and are in agreement regarding all provisions of the attached agreed Protective Order. The parties further agree that the entry of the proposed agreed Protective Order is appropriate in this case as discovery will encompass disclosure of materials from the parties or third parties pertaining to sensitive information, including, but not limited to, documents that may reflect confidential business information.

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests that this Court grant its Motion for Entry of Agreed Protective Order.

Dated: May 4, 2015

Respectfully submitted,

By: s/ Joseph J. Siprut

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***Counsel for Plaintiff
and the Proposed Putative Class***

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing **Unopposed Motion for Entry of Agreed Protective Order** was filed on this 4th day of May, 2015, via the electronic filing system of the United States District Court for the Northern District of Illinois, which will automatically serve all counsel of record.

s/ Joseph J. Siprut
